

REMARKS

Reconsideration of the application in view of the above amendments and the following remarks is requested. Claims 9 and 13-20 are in this application. Claim 16 has been amended. Claims 1-8, 10-12, and 21 have been cancelled.

The Examiner rejected claims 9 and 13-20 under 35 U.S.C. §102(b) as being anticipated by Kim (U.S. Patent No. 5,844,280). For the reasons set forth below, applicant respectfully traverses this rejection.

Claim 16 recites, in part,

“a separation region of the semiconductor material located only between the first and second trigger regions, the separation region contacting the surface, the first trigger region, and the second trigger region; and

“a device region that overlies and contacts the surface at a location where the separation region contacts the surface between the first and second trigger regions, the device region at the location being free of a gate, and not lying below a gate.”

In rejecting the claims, the Examiner pointed to the region lying between wells 2a and 2b shown in FIG. 3 of the Kim reference as constituting the gap region required by previous claim 16. Additionally, the Examiner argued that the gap region can include the portions of the n+ regions 6a and 6b that lie outside of the wells 2a and 2b, respectively. Based on this, the Examiner pointed to the region that lies above the “gap portions” of n+ regions 6a and 6b, and next to gate 24, as constituting the device region required by claim 16.

Applicant disagrees that the gap region of previous claim 16 can be read to include portions of n+ regions 6a and 6b shown in FIG. 3 of Kim because the gap region is a region of the semiconductor material. However, to further prosecution, claim 16 has been amended to recite a separation region that lies only between the first and second trigger regions. As a result, the portions of the n+ regions 6a and

6b that lay outside of the wells 2a and 2b, respectively, can not be read to part of the separation region.

As shown in FIG. 3 of Kim, the separation region of substrate 1, which lies only between trigger regions 6a and 6b, contacts the surface only below gate 24. Since the device region of claim 16 must contact the surface at the location that the separation region contacts the surface, it is not possible for a device region of Kim to lie anywhere but under gate 24. Thus, since a device region of Kim must lie below gate 24, the device region of Kim can not be read to be the device region required by claim 16.

As a result, claim 16 is not anticipated by the Kim reference. In addition, claims 9, 13-15, and 17-20 depend either directly or indirectly from claim 16. Thus, claims 9, 13-15, and 17-20 are not anticipated by Kim for the same reasons as claim 16.

Thus, for the foregoing reasons, it is submitted that all of the claims are in a condition for allowance. Therefore, the Examiner's early re-examination and reconsideration are respectively requested.

Respectfully submitted,

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